

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :
-----x

-against- : NOTICE OF MOTION

GLENN THOMAS, : IND. NO. 12 CR 626 (ER)

Defendants. :
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PLEASE TAKE NOTICE, that upon the accompanying Declaration, Memorandum of Law, and all prior proceedings had herein, the defendant GLENN THOMAS will move before the Honorable EDGARDO RAMOS, United States District Judge at the Courthouse located at 40 Foley Square, New York, New York 10007, for counsel to be heard on date to be determined by the Court February 4, 2105 for an Order, pursuant to Rule 29 of the Federal Rules of Criminal Procedure, directing a judgment of acquittal; or in the alternative, an Order, pursuant to Rule 33 of the Federal Rules of Criminal Procedure, directing a new trial, and for leave to join in the post-verdict motions of co-counsel to the extent applicable and such other and further relief as the Court may deem just and proper.

Dated: New York, New York
January 26, 2015

Yours, etc.,



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